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Attorney for Defendant
HUGO RAMIREZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUGO RAMIREZ, et al.

Defendants.

No. Cr. S-05-0090 WBS

STIPULATED BRIEFING SCHEDULE
AND [PROPOSED] ORDER AND
EXCLUSION OF TIME

The United States of America, through Assistant U.S. Attorney Matthew D. Segal, defendant Hugo Ramirez, through his counsel Scott L. Tedmon, and defendant Jayson Edwards, through his counsel Mark Reichel, hereby stipulate that the current briefing schedule be vacated and the following briefing schedule be adopted. Scott L. Tedmon, counsel for defendant Hugo Ramirez, needs additional time to conduct necessary research and investigation relating to prospective defense motions. Additionally, counsel for defendant Ramirez needs to confer with his client and defendant Edwards' counsel regarding any such motions, and prepare any motion to be filed. The proposed briefing schedule is as follows:

_____ Defendants shall file and serve all motions by November 9, 2005.

Government's response shall be filed and served by November 23, 2005.

Defendants reply shall be filed and served by December 7, 2005.

1 The non-evidentiary hearing date on motions shall be December 21, 2005 at 9:00 a.m.

2 If necessary, any subsequent evidentiary hearing date shall be set at the December 21, 2005
3 court appearance. Sally Hoover has approved the foregoing schedule. No trial date has been set in
4 this case.

5 **SPEEDY TRIAL ACT - EXCLUSION OF TIME**

6 The parties stipulate that time should be excluded through December 21, 2005 under the
7 Speedy Trial Act based on the needs of counsel to prepare for any motion. 18 U.S.C.
8 §3161(h)(8)(B)(iv); Local Code T4. The parties stipulate and agree that the interests of justice
9 served by granting this continuance outweigh the best interests of the public and the defendant in a
10 speedy trial. 18 U.S.C. § 3161(h)(8)(A).

11 Finally, Scott L. Tedmon has been authorized by all counsel to sign this stipulation on their
12 behalf.

13 **IT IS SO STIPULATED.**

14 DATED: October 19, 2005

McGREGOR W. SCOTT
United States Attorney

15 /s/ Matthew D. Segal
16 MATTHEW D. SEGAL
Assistant U.S. Attorney

17 DATED: October 19, 2005

LAW OFFICES OF SCOTT L. TEDMON

18 /s/ Scott L. Tedmon
19 SCOTT L. TEDMON
Attorney for Hugo Ramirez

20 DATED: October 19, 2005

FEDERAL DEFENDER'S OFFICE

21 /s/ Mark Reichel
22 MARK REICHEL
Attorney for Jayson Edwards

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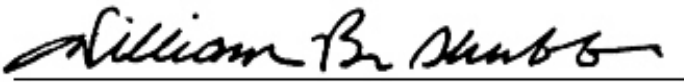
ORDER

GOOD CAUSE APPEARING and based upon the above stipulation, IT IS HEREBY ORDERED that the briefing schedule set forth above is hereby adopted.

Based upon the above stipulation, IT IS FURTHER ORDERED that time be excluded under the Speedy Trial Act for needs of counsel to prepare pursuant to 18 U.S.C. §3161(h)(8)(B)(iv), Local Code T4, through December 21, 2005, the date of the hearing on the motions. The Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

IT IS SO ORDERED.

DATED: October 20, 2005


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE